

# **EXHIBIT C**

1  
2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK

4 Case No.: 1:19-cv-05434 (VM)

5 - - - - - x  
6 )  
7 STATE OF NEW YORK, STATE OF )  
8 CALIFORNIA, STATE OF COLORADO, )  
9 STATE OF CONNECTICUT, STATE OF )  
10 COLUMBIA, STATE OF MARYLAND, )  
11 STATE OF MICHIGAN, STATE OF )  
12 MISSISSIPPI, COMMONWEALTH OF )  
13 VIRGINIA, and STATE OF WISCONSIN )  
Plaintiffs, )  
-against- )  
DEUTSCHE TELEKOM AG, T-MOBILE US )  
INC., SPRINT CORPORATION and )  
SOFTBANK GROUP CORP., )  
Defendants. )  
14 - - - - - x

15 Friday, October 18, 2019  
16 9:40:a.m.

17  
18  
19 VIDEO DEPOSITION OF HANNES WITTIG,  
20 taken by Plaintiff State of New York, held at  
21 Gibson, Dunn & Crutcher LLP, Telephone House  
22 2-4, Temple Avenue, London EC4Y, United Kingdom  
23 reported by Chanelle Malliff, Realtime Court  
24 Reporter of the United Kingdom and Europe.  
25

1 HANNES WITTIG

2 not. It's too long ago.

3 Q. Do you have a general recollection as to whether  
4 you actively participated by sharing your viewpoint as  
5 opposed to, for example, taking notes?

6 MR. SOVEN: Objection to form.

7 A. I frankly don't remember if I said anything but  
8 I participated and normally when I participate in a meeting  
9 I say something, but I can't specifically recollect  
10 anything. It was a big group of people, so. And I wasn't  
11 at the center of this workshop. I didn't organize it.  
12 I didn't lead it. I didn't -- there were lots of people  
13 with views in the room, so don't know. I actually don't  
14 remember whether I said something or not.

15 BY MS. WESSELS-YEN:

16 Q. Who did organize the workshop?

17 A. It was hosted by our strategy group which is led  
18 by Matthias Budde. He's on the e-mail here. And Steffen  
19 Stern. Stern worked for him at the time. Part of  
20 Matthias Budde's remit is that he is market forecasting, so  
21 that's -- so I don't know the background to this, frankly,  
22 specifically why Matthias Budde was asked to do this.

23 Q. Do you remember who led the workshop?

24 A. It was -- the moderator was Steffen Stern.

25 Q. Do you have any other information about what

1 HANNES WITTIG

2 Mr. Stern's role was with regard to the workshop?

3 A. Well, you asked with regard to the workshop. He  
4 organized it and hosted it. I don't know what else he did  
5 in this context. I was not involved in the preparation of  
6 this document or in the -- so I was a guest in this event.

7 Q. And Mr. Stern also took and shared his notes as  
8 well; correct?

9 A. I don't know. I could see here that I provided  
10 some notes and you have also kindly provided me with some  
11 notes from Mr. Stern but I don't -- so that's kind of what  
12 I see. I don't recall more. It wasn't -- let's say from my  
13 perspective this was not a consequential workshop, if I can  
14 say it this way, so therefore I don't have a strong  
15 recollection of it.

16 Q. If you could turn to slide 5 of the presentation.  
17 That's the one that has, as a header, workshop participants  
18 at a glance. If you could take a second to look at that.  
19 Do you recall whether these people participated in the  
20 workshop?

21 A. Well I know for sure that Thorsten Langheim did  
22 not participate in the workshop I was in. But I remember  
23 Peter Ewens, Matthias Budde and Steffen Stern. Volker,  
24 sorry, I don't remember you.

25 Q. Again Dr. Stapper is here to observe alone. We